

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan



Division

DAWN R. BELL

Case: 3:22-cv-10502

Judge: Cleland, Robert H.

MJ: Stafford, Elizabeth A.

Filed: 03-08-2022 At 10:54 AM

CMP DAWN BELL V SAULT TRIBE OF CHIPPEWA INDIANS, ET AL (LG)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

SAULT TRIBE OF CHIPPEWA INDIANS, SAULT STE MARIE POLICE DEPARTMENT, CITY OF SAULT STE MARIE, SAULT STE MARIE DOWNTOWN DEVELOPMENT, HAAN DEVELOPMENT

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☐ Yes ☒ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Dawn R. Bell
33 North Street
Burlington
Vermont, 05401
802-363-0851

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Sault Ste Marie Downtown Development Authority
Job or Title <i>(if known)</i>	
Street Address	511 Ashmun St Suite 103
City and County	Sault Saint Marie/Chippewa
State and Zip Code	MI 49783
Telephone Number	906-635-6973
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	Sault Ste Marie Police Department
Job or Title <i>(if known)</i>	
Street Address	401 Hursley St
City and County	Sault Ste Marie/Chippewa
State and Zip Code	Mich 49783
Telephone Number	906-632-5744
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	Sault Saint Marie City Commission
Job or Title <i>(if known)</i>	
Street Address	City Hall 225 East Portage Avenue
City and County	Sault Ste Marie/Chippewa
State and Zip Code	Mich 49783
Telephone Number	906-632-5700
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	Sault Tribe Of Chippewa County
Job or Title <i>(if known)</i>	
Street Address	523 Ashmun St
City and County	Sault Ste Marie/Chippewa
State and Zip Code	Mich 49783
Telephone Number	906-635-6050
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

RICO ACT SEE ATTACHMENT

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* DAWN BELL, is a citizen of the
State of *(name)* VERMONT

b. If the plaintiff is a corporation

The plaintiff, *(name)*, is incorporated
under the laws of the State of *(name)*,
and has its principal place of business in the State of *(name)*

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)*, is a citizen of
the State of *(name)*. Or is a citizen of
(foreign nation)

The defendant, (name) Sault Tribe Of Chippewa Indians

b. If the defendant is a corporation The defendant,
(name) Sault Tribe Chippewa Indians

the laws of the State of (name) **Michigan**
principal place of business in the State of (name)
Michigan

Or is incorporated under the laws of (foreign nation) **No**
and has its principal place of business in (name)

(If more than one defendant is named in the complaint,
attach an additional page providing the same informa-
tion for each additional defendant.)

The defendant, (name) Sault Ste Marie Police Department

b. If the defendant is a corporation The defendant, (name) Sault Ste Marie Police Department

the laws of the State of (name) **Michigan**
principal place of business in the State of (name)
Michigan

Or is incorporated under the laws of (foreign nation) **No**
and has its principal place of business in (name)

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

The defendant, (name) Sault Ste Marie City Commisson

b. If the defendant is a corporation The defendant,
(name)Sault Ste Marie City Commisson

the laws of the State of (name) **Michigan**
principal place of business in the State of (name)
Michigan

Or is incorporated under the laws of (foreign nation) **No**
and has its principal place of business in (name)

(If more than one defendant is named in the complaint,
attach an additional page providing the same informa-
tion for each additional defendant.)

The defendant, (name) Sault Ste Marie Downtown Development Authority

b. If the defendant is a corporation The defendant, (name) Sault Ste Marie Downtown Development Authority

the laws of the State of (name) **Michigan**
principal place of business in the State of (name)
Michigan

Or is incorporated under the laws of (foreign nation) **No**
and has its principal place of business in (name)

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

The defendant, (name) Sault Ste Marie Downtown Development Authority

b. If the defendant is a corporation The defendant, (name) Sault Ste Marie Downtown Development Authority

the laws of the State of (name) **Michigan**
principal place of business in the State of (name)
Michigan

Or is incorporated under the laws of (foreign nation) **No**
and has its principal place of business in (name)

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

b. If the defendant is a corporation

The defendant, (name) HAAN DEVELOPMENT, is incorporated under the laws of the State of (name) MICHIGAN, and has its principal place of business in the State of (name) MICHIGAN. Or is incorporated under the laws of (foreign nation), and has its principal place of business in (name) MICHIGAN.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

THE AMOUNT IN CONTROVERSY IS 10 BILLION DOLLARS

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

THESE AGENCIES LISTED HAVE BEEN ALLOWED BY THE STATE OF MICHIGAN AND SEVERAL OTHER STATES INVOLVED IN MY CASE, TO TERRORIZE, BELITTLE, COERCE, KIDNAP, AND TRAFFIC, WITHOUT ANYONE DOING ANYTHING ABOUT THE SITUATION EXCEPT WHEN IT COULD HELP SOMEONE'S POLITICAL GAIN, THIS WOULD TAKE WORLD AUTHORITIES TO GET INVOLVED. THESE CRIMES TOOK PLACE IN FROM 2017- PRESENT.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

THESE AGENCIES RUINED MY LIFE, IN EVERYWAY, ESPECIALLY WITH PTSD, THEY STOLE MY LAND, AND DESTROYED EVERYTHING IN WHICH I VALUED, INCLUDING MY HEALTH. THESE AGENCIES TRIED TO MURDER MYSELF AND MY CHILDREN FOR ATTEMPTING TO FILE LAWSUITS,

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: March 8, 2022

Signature of Plaintiff

Printed Name of Plaintiff

Dawn R. Bell
DAWN R. BELL

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

(Rev. 02/19)

CIVIL COVER SHEET

Use JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Dawn R. Bell

(b) County of Residence of First Listed Plaintiff

(EXCEPT IN U.S. PLAINTIFF CASES)

Burlington

(c) Attorneys (Firm Name, Address, and Telephone Number)

DEFENDANTS

South Tribe of Chippewa Indians

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State ☐ 1 ☒ 1 Incorporated or Principal Place of Business In This State ☐ 4 ☒ 4
- Citizen of Another State ☒ 2 ☐ 2 Incorporated and Principal Place of Business In Another State ☐ 5 ☐ 5
- Citizen or Subject of a Foreign Country ☐ 3 ☐ 3 Foreign Nation ☐ 6 ☐ 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

VI. CAUSE OF ACTION

Brief description of cause:

These agencies are involved in human trafficking and sex exploitation

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

22,000,000.00

CHECK YES only if demanded in complaint:

JURY DEMAND:

☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

3-8-22

SIGNATURE OF ATTORNEY OF RECORD

Dawn R. Bell

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

PURSUANT TO LOCAL RULE 83.11

1. Is this a case that has been previously dismissed?

☐ Yes
☒ No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

☐ Yes
☒ No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

Notes :
